

EXHIBIT “B”

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:	:	CHAPTER 11
	:	
SCUNGIO BORST & ASSOCIATES, LLC,	:	BANKRUPTCY NO. 22-10609 (AMC)
	:	
Debtor.	:	
	:	

**DECLARATION OF ROBERT M. GREENBAUM IN SUPPORT OF
THE OBJECTION OF SCUNGIO BORST & ASSOCIATES LLC
TO PROOF OF CLAIM NO. 19 FILED
BY ANI & JOE ABATEMENT & DEMOLITION LLC**

STATE OF PENNSYLVANIA)

COUNTY OF PHILADELPHIA)

I, Robert M. Greenbaum, being duly sworn, hereby depose and say:

1. I am over 18 years of age. I am fully competent to make this declaration. I have personal knowledge of the facts stated in this declaration and the Objection of Scungio Borst & Associates LLC to Proof of Claim No. 19 filed by Ani & Joe Abatement & Demolition LLC (the “Objection”).

2. I am competent and qualified to make this declaration pursuant to 28 U.S.C. § 1746.

I declare under penalty of perjury that the foregoing is true and correct.

3. I am *of counsel* at Karalis PC which firm has been retained as bankruptcy counsel to Scungio Borst & Associates, LLC (the “Debtor”).

4. As Debtor’s counsel, I reviewed the Debtor’s schedules, Proof of Claim No. 19 filed by Ani & Joe Abatement & Demolition LLC, and the claims register maintained by the Clerk’s Office for the United States Bankruptcy Court for the Eastern District of Pennsylvania prior to preparing and filing the Objection with the Court.

5. All of the facts and averments set forth in the Objection are true and correct and I offer these facts and averments in support of the Objection.

/s/ Robert M. Greenbaum
Robert M. Greenbaum, Esquire
Counsel to the Debtor

Dated: February 9, 2024